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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE TFT-LCD (FLAT PANEL)) Master File No. C07-1827 SI
 ANTITRUST LITIGATION)

) MDL No. 1827

This Document Relates to:) **STIPULATION OF DISMISSAL OF**
) **KONINKLIJKE PHILIPS**
) **ELECTRONICS N.V. AND**
) **[PROPOSED] ORDER OF DISMISSAL**

ALL DIRECT PURCHASER ACTIONS)

IT IS HEREBY STIPULATED by and between the Direct Purchaser Plaintiffs and Defendant Koninklijke Philips Electronics N.V. ("Royal Philips") through their designated counsel, that the above-captioned action be dismissed without prejudice only against Defendant Royal Philips pursuant to Federal Rule of Civil Procedure 41(a)(1). Each party shall bear their own attorney's fees and costs. Further, Defendant Royal Philips hereby withdraws its MOTION TO DISMISS THE DIRECT PURCHASER PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT dated February 19, 2008 without prejudice to renewing the Motion, including without limitation any defense of lack of personal jurisdiction, in the event that the claims against Royal Philips are reinstated. Neither the entry into this Stipulation nor its approval by the Court shall waive or otherwise prejudice any claim or defense in this Action.

SO STIPULATED

Dated: September 16, 2008

PEARSON, SIMON, SOTER, WARSHAW & PENNY, LLP

By: /s/ Bruce L. Simon
 BRUCE L. SIMON
Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs and the Proposed Class

Dated: September 16, 2008

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

By: /s/ Richard M. Heimann (by EBF)
 RICHARD M. HEIMANN
Interim Co-Lead Counsel for the Direct Purchaser Plaintiffs and the Proposed Class

Dated: September 16, 2008

SULLIVAN & CROMWELL LLP

By: /s/ Theodore Edelman
 THEODORE EDELMAN
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Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from Richard M. Heimann and Theodore Edelman.

[PROPOSED] ORDER OF DISMISSAL

Good cause appearing, Defendant Koninklijke Philips Electronics N.V. is dismissed without prejudice from the Direct Purchaser Actions.

IT IS SO ORDERED.

DATED: _____, 2008

By: 
The Honorable Susan Illston
United States District Court Judge